

THE HONORABLE KYMBERLY K. EVANSON  
MAGISTRATE JUDGE MICHELLE L. PETERSON

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JENNIFER JAYLEE,

Plaintiff,

V.

LESLIE O'CONNOR,

Defendant.

) No. 2:22-cv-01392-KKE-MLP  
)  
) AMENDED [~~PROPOSED~~] ORDER  
) GRANTING STIPULATED MOTION TO  
) SEAL  
)  
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BEFORE this Court on the parties' Stipulated Motion to Seal the Court having reviewed said motion, declaration, and other evidence submitted by the parties and being otherwise fully advised does hereby find and **ORDER:**

1. The parties' stipulated motion to seal the videos is **GRANTED**;
2. The Court finds that there are compelling reasons to seal the video surveillance footage (Exhibit F of the Declaration of Counsel) filed with Plaintiff's Response to Defendant's Motion for Summary Judgment.
3. The Court has balanced these reasons with the public's right to know and the public interest. Although there is public interest in having access to materials submitted as part of a

1 response to the motion for summary judgment, the interest is outweighed here by the  
2 overwhelming compelling interest in maintaining the confidentiality and security of Department  
3 of Corrections' facilities. Furthermore, any public interest or legitimate need to know the  
4 information can be preserved to some degree by the parties' reference to the video.

5 4. There is no lesser way to protect the interests at stake here due to the nature of the  
6 evidence and the concerns presented by such evidence.

7 5. The Clerk is directed to send uncertified copies of this Order to counsel for plaintiff and  
8 counsel for defendants.

9 DATED this 11th day of July, 2024.

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12 MICHELLE L. PETERSON  
13 United States Magistrate Judge

14 Submitted by:

15 CIVIL RIGHTS JUSTICE CENTER, PLLC

16 /s/ Darryl Parker

17 Darryl Parker, WSBA #30770  
18 Attorney for Plaintiff

19 ROBERT W. FERGUSON  
20 Attorney General

21 /s/ Aaron Williams

22 Aaron Williams, WSBA #46044  
23 Sean Brittain, WSBA #36804  
Assistant Attorneys General  
Corrections Division

**CERTIFICATE OF SERVICE**

I, Ishika Vasudeva, under penalty of perjury under the laws of the State of Washington, declare as follows:

I am a legal assistant at the Civil Rights Justice Center, PLLC, and am over the age of 18. On the date and in the manner indicated below, I caused a true and correct copy of AMENDED [PROPOSED] ORDER GRANTING STIPULATED MOTION TO SEAL to be electronically filed with the Clerk of the Court using CM/ECF system which will send notification of filing to all counsel of record.

DATED: this 9<sup>th</sup> day of July 2024, at Seattle, Washington.

/s/ Ishika Vasudeva  
**Ishika Vasudeva**, Legal Assistant